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*Attorneys for Defendant  
University Press of Mississippi*

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

**SUZI ALTMAN,**

Plaintiff,

v.

**UNIVERSITY PRESS OF  
MISSISSIPPI and  
HALEY R. BARBOUR,**

Defendants.

Case No. 3:16-cv-00883-CWR-LRA

**MOTION FOR EXTENSION OF  
TIME OF DEFENDANT  
UNIVERSITY PRESS OF  
MISSISSIPPI TO RESPOND TO  
COMPLAINT**

Response Date: December 12, 2016

Action Filed: 11/10/2016

Defendant University Press of Mississippi, through its undersigned counsel, hereby respectfully requests an extension of time of thirty (30) days to respond to Plaintiff's Complaint. Counsel for Defendant has consulted with Counsel for Plaintiff, who has consented to and does not oppose the request herein for

1 reasonable additional time to plead. In support of the motion, the Defendant states  
2 as follows:

- 3  
4 1. On November 10, 2016, Plaintiff filed her Complaint in this case. *See*  
5 Docket Entry (“D.E.”) 1. The Complaint alleges copyright infringement  
6 under the U.S. Copyright Act.
- 7 2. Under the Federal Rules of Civil Procedure, the Defendant’s response to the  
8 Complaint would be due on or before December 12, 2016. *See* Fed. R. Civ.  
9 P. 12(a)(1)(A)(i).
- 10 3. On December 7, 2016, counsel for Defendant conferred with William O.  
11 Luckett, Jr., Esq., counsel for Plaintiff, regarding the timing of Defendant’s  
12 response to the Complaint and the request for an extension of time for  
13 response to the Complaint. Counsel for Plaintiff consented to and does not  
14 oppose Defendant’s request for an extension of time to file a response of a  
15 reasonable amount of additional time of thirty (30) days, which would make  
16 the new response deadline January 11, 2017.
- 17 4. The request for extension of time is for good cause and will not result in  
18 undue delay in the administration of this case. The Complaint raises  
19 complex issues that a time extension will allow the Defendant to address.  
20 The extension of time for filing the Defendant’s response is necessary due to  
21 the issues involved, the Defendant’s counsel’s workload, and the holiday  
22 season.
- 23 5. No other requests for extensions of time have been previously requested in  
24 this case. No dates have been set for a pre-trial conference or trial.

1 IN WITNESS WHEREOF, Defendant University Press of Mississippi  
2 respectfully moves that this Court extend the time for responding to Plaintiff's  
3 Complaint to January 11, 2017.

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7 Dated: December 7, 2016

Respectfully submitted,

8 JIM HOOD  
9 Attorney General of Mississippi  
10 S/ LAWRENCE A. SCHEMME  
11 Office of the Attorney General  
12 MSB No. 9811

*Attorneys for Defendant*  
*University Press of Mississippi*

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*Certificate of Service*

I hereby certify that on December 7, 2016, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following: William O. Lockett, Jr., Esq., [wol@luckettyner.com](mailto:wol@luckettyner.com) and I hereby certify that I have mailed by United States Postal Service the document to the following non-ECF participants: NA.

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Respectfully submitted,

JIM HOOD  
Attorney General of Mississippi  
S/ LAWRENCE A. SCHEMMEL  
Office of the Attorney General  
MSB No. 9811

*Attorneys for Defendant*  
*University Press of Mississippi*